

[Counsel Signatures Appear at the End]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**JOINT SUBMISSION OF PROPOSED
VOIR DIRE QUESTIONS**

Judge: The Honorable William Alsup

Trial Date: October 10, 2017

JOINT SUBMISSION OF PROPOSED *VOIR DIRE* QUESTIONS

Pursuant to the Court's Guidelines for Trial and Final Pretrial Conference in Civil Jury Cases, the parties submit the following proposed *voir dire* questions:

Key Questions

1. Do you, or does anyone close to you, have any training, experience or special knowledge in any of the following fields? If so, please tell me about it.

Vehicle design and manufacturing
Self-driving vehicles
Optical lasers or LiDAR
Radar
Semiconductor design
Electrical engineering
Product design and development
Finance
Trade secret law
Buying or selling companies
Forensic analysis of data systems
Data security

2. Do you consider yourself computer savvy? Do you regularly read technology or computer articles or magazines? If so, how often?

3. Are you familiar with any self-driving vehicle technologies—technologies that permit a vehicle to operate with minimal or no human control? Do you have any strong feelings, positive or negative, about self-driving vehicle technologies?

4. Have you ever worked for a company that has trade secrets or patents? If so, what role did you have with respect to the company's intellectual property?

5. Have or anyone close to you ever owned a business. If so, what type and was it successful?

6. Have you ever served as a juror before? Was it a civil or criminal case? What did the case involve? Was it a positive or negative experience for you?

7. Have you ever been involved in litigation over trade secrets or patents?

8. Have you ever been involved in selling, buying, or licensing trade secrets or patents?

9. Do you feel that if one company accuses another company of stealing secrets or infringing its patents, the accusation is probably true or probably not true?

10. Does anyone here have a close relationship to a lawyer?

11. Is there a reason, because of your background or employment, that you believe you cannot judge this case impartially?

12. Do you know of any other matter which you believe should be called to the court's attention as having some bearing upon your qualifications or ability to sit as a juror, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law?

Dated: September 20, 2017

MORRISON & FOERSTER LLP

By: /s/ Arturo J. González
ARTURO J. GONZÁLEZ

Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

Dated: September 20, 2017

GOODWIN PROCTER LLP

By: /s/ Neel Chatterjee
NEEL CHATTERJEE

Attorneys for Defendant
OTTO TRUCKING, LLC

Dated: September 20, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By: /s/ Charles K. Verhoeven
CHARLES K. VERHOEVEN

Attorneys for Plaintiff
WAYMO LLC

ATTESTATION OF E-FILED SIGNATURE

I, Charles K. Verhoeven, am the ECF User whose ID and password are being used to file this Joint Submission of Proposed *Voir Dire* Questions. In compliance with General Order 45, X.B., I hereby attest that Arturo J. González and Neel Chatterjee have concurred in this filing.

Dated: September 20, 2017

/s/ Charles K. Verhoeven
Charles K. Verhoeven